

## Jim Newsom

---

**From:** Bryce Ashby <Bryce@donatilaw.com>  
**Sent:** Friday, August 27, 2021 3:17 PM  
**To:** Jim Newsom  
**Subject:** Complaint and Motion for TRO  
**Attachments:** [Doc. 1] Complaint.pdf; [Doc. 2] Motion for TRO and Pl.pdf; [Doc. 2-1] Brief in Support of TRO.pdf; [Doc. 2-2] Decl of B. Schwaigert.pdf; [Doc. 2-3] Decl. of E Tremel.pdf; [Doc. 2-4] Decl. of Dr. Wilson-Townsend.pdf; [Doc. 2-5] Decl. of Dr. Sara Cross.pdf

Jim,

See attached. This was just filed. Please let me know whether you can accept service. If so, I can bring it to you this afternoon.

Bryce

**Bryce W. Ashby**, Attorney  
1545 Union Avenue, Memphis, TN 38104  
phone 901.278.1004 | direct 901.385.3153  
fax 901.278.3111 | [bryce@donatilaw.com](mailto:bryce@donatilaw.com)  
[www.donatilaw.com](http://www.donatilaw.com)



*This message contains information which may be confidential and privileged. If you are not the intended recipient, please advise the sender and delete the message. Any tax advice contained in this email is not intended to be used for the purpose of avoiding penalties that may be imposed by the IRS.*



## Jim Newsom

---

**From:** Bryce Ashby <Bryce@donatilaw.com>  
**Sent:** Friday, August 27, 2021 4:11 PM  
**To:** Jim Newsom  
**Subject:** RE: Complaint and Motion for TRO

Can I come by now and drop it off?

**From:** Jim Newsom <Jim.Newsom@ag.tn.gov>  
**Sent:** Friday, August 27, 2021 4:11 PM  
**To:** Bryce Ashby <Bryce@donatilaw.com>  
**Subject:** RE: Complaint and Motion for TRO

Bryce,

I have been authorized to accept service for the State.

Jim

**Jim Newsom** | Special Counsel  
Office of the Attorney General and Reporter  
40 South Main Street, Suite 1014  
Memphis, TN 38103-1877  
901-543-2473  
[jim.newsom@ag.tn.gov](mailto:jim.newsom@ag.tn.gov)



*Our mission – We are the State's law office serving Tennessee with principled, independent, and excellent counsel.*

\_\_\_\_\_  
NOTICE

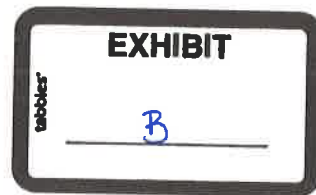
This e-mail message and any attachment are for use by the recipient only, and contain information that may be legally privileged and confidential from the Tennessee Attorney General's Office. If you are not the intended recipient, DO NOT review, transmit, convert to hard copy, copy, use or disseminate this e-mail or any attachments to it. If you received this email in error, please immediately notify us by return email or telephone at 615-741-4060 and permanently delete this message. Receipt by anyone other than the intended recipient is not a waiver of any deliberative process privilege, joint prosecution privilege, attorney-client privilege, work product immunity or any other privilege or immunity.

**From:** Bryce Ashby <Bryce@donatilaw.com>  
**Sent:** Friday, August 27, 2021 3:17 PM  
**To:** Jim Newsom <Jim.Newsom@ag.tn.gov>  
**Subject:** Complaint and Motion for TRO

Jim,

See attached. This was just filed. Please let me know whether you can accept service. If so, I can bring it to you this afternoon.

Bryce



**Bryce W. Ashby, Attorney**

1545 Union Avenue, Memphis, TN 38104

phone 901.278.1004 | direct 901.385.3153

fax 901.278.3111 | [bryce@donatilaw.com](mailto:bryce@donatilaw.com)

[www.donatilaw.com](http://www.donatilaw.com)



*This message contains information which may be confidential and privileged. If you are not the intended recipient, please advise the sender and delete the message. Any tax advice contained in this email is not intended to be used for the purpose of avoiding penalties that may be imposed by the IRS.*

**Jim Newsom**

---

**From:** Bryce Ashby <Bryce@donatilaw.com>  
**Sent:** Friday, August 27, 2021 5:02 PM  
**To:** Jim Newsom  
**Subject:** Fwd: Activity in Case 2:21-cv-02552-SHL-atc G.S., by and through his parents and next friends, Brittany and Ryan Schwaigert et al v. Lee et al "Setting Letter"

Jim,

See setting letter below. Thanks.

Bryce

Sent from my iPhone

Begin forwarded message:

**From:** cmecfhelpdesk@tnwd.uscourts.gov  
**Date:** August 27, 2021 at 4:48:25 PM CDT  
**To:** courtmail@tnwd.uscourts.gov  
**Subject:** Activity in Case 2:21-cv-02552-SHL-atc G.S., by and through his parents and next friends, Brittany and Ryan Schwaigert et al v. Lee et al "Setting Letter"

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\* Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

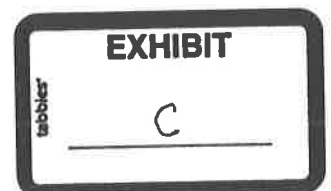
U.S. District Court

Western District of Tennessee

**Notice of Electronic Filing**

The following transaction was entered on 8/27/2021 at 4:47 PM CDT and filed on 8/27/2021

**Case Name:** G.S., by and through his parents and next friends, Brittany and Ryan Schwaigert et al v. Lee et al  
**Case Number:** 2:21-cv-02552-SHL-atc  
**Filer:**  
**Document Number:** 11



**Docket Text:**

**SETTING LETTER: Re: A Hearing on Plaintiff's Motion for Temporary Restraining Order [2] has been set for Monday, August 30, 2021 at 11:00 AM in Courtroom 1 - Memphis before Judge Sheryl H. Lipman. Plaintiffs Counsel is directed to notify the defendant/defendants counsel of hearing.**

**This will be an in-court hearing. There will be limited seating for the public. The parties are instructed to notify the case manager if this will be an evidentiary hearing and if any other persons will attend other than the parties in this case. All persons entering a court facility must follow all rules adopted for the federal building. Participants may not enter the building, or they may be removed from the building, if they fail to comply with federal building rules and screening protocols. Everyone in the Courtroom will be required to wear a face covering over their mouth and nose. (smm)**

**2:21-cv-02552-SHL-atc Notice has been electronically mailed to:**

Robert A. Donati robert@donatilaw.com, darvius@donatilaw.com, rebecca@donatilaw.com

Bryce William Ashby bryce@donatilaw.com, jacque@donatilaw.com

Brice Moffatt Timmons brice@donatilaw.com, cedgington@blackmclaw.com, craig@donatilaw.com, jacque@donatilaw.com, jwilson@blackmclaw.com

Craig A Edgington craig@donatilaw.com, jacque@donatilaw.com

**2:21-cv-02552-SHL-atc Notice will not be electronically mailed to:**

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1059513201 [Date=8/27/2021] [FileNumber=4227012-0]  
] [a28756a100f3a2de9b48133c3569710d4504eb8a09077a7bfd03c24c5f8cd1b5534  
540470df329d9903b284b24f29a9f7500939bcc6b9aaf3fbccdc511b74d77]]

## Jim Newsom

---

**From:** Bryce Ashby <Bryce@donatilaw.com>  
**Sent:** Saturday, August 28, 2021 4:30 PM  
**To:** Jim Newsom  
**Cc:** Brice Timmons; Craig Edgington; Robert Donati  
**Subject:** Re: G.S. ex rel. Schwaigert, et al. v. Lee, W.D. Tenn. No. 2:21-cv-02552-SHL-atc

Thanks, Jim. I appreciate you letting us know.

Sent from my iPhone

On Aug 28, 2021, at 4:21 PM, Jim Newsom <jim.newsom@ag.tn.gov> wrote:

Bryce,

This is to advise that the State will object to the presentation of live testimony at the TRO hearing on Monday. Plaintiffs have filed declarations in support of the application. These declarations should suffice at the TRO stage. Moreover, the State will object to any proposal that the hearing on Plaintiffs' TRO application be combined with Plaintiffs' application for a preliminary injunction. We so advise you in advance as a courtesy to avoid unnecessary inconvenience to persons who would not otherwise attend or who might modify their schedules.

Jim

**Jim Newsom** | Special Counsel  
Office of the Attorney General and Reporter  
40 South Main Street, Suite 1014  
Memphis, TN 38103-1877  
901-543-2473  
[jim.newsom@ag.tn.gov](mailto:jim.newsom@ag.tn.gov)

<image001.png>

*Our mission – We are the State's law office serving Tennessee with principled, independent, and excellent counsel.*

NOTICE

This e-mail message and any attachment are for use by the recipient only, and contain information that may be legally privileged and confidential from the Tennessee Attorney General's Office. If you are not the intended recipient, DO NOT review, transmit, convert to hard copy, copy, use or disseminate this e-mail or any attachments to it. If you received this email in error, please immediately notify us by return email or telephone at 615-741-4060 and permanently delete this message. Receipt by anyone other than the intended recipient is not a waiver of any deliberative process privilege, joint prosecution privilege, attorney-client privilege, work product immunity or any other privilege or immunity.

